## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY CAMDEN VICINAGE

In re: Valsartan Products Liability

Litigation

MDL No. 2875

Plaintiff,

No. 1:19-md-2875 -RBK

VS.

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This document relates to: Plaintiff, Ken Wiseman PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL

## PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL OF ACTION WITHOUT PREJUDICE

Plaintiff, Ken Wiseman, pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, hereby gives notice of his voluntary dismissal of all claims asserted against all Defendants identified in his action, without prejudice, in the above-captioned matter.

Specifically, Rule 41 (a)(1)(A)(i) sets out that a Plaintiff may voluntarily dismiss its claims without prejudice and without a Court Order by notice at any time prior to the Defendants filing an Answer or moving for summary judgment. Thus, Plaintiff's request is permitted as of the filing of this Notice. In light thereof, Plaintiff asserts that voluntary dismissal by notice alone is appropriate under Rule 41 (a)(1)(A)(i).

Respectfully submitted,

Dated: 18 October 2021 THE BEASLEY FIRM, LLC

/s/Peter J. Johnsen, Esquire
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## **CERTIFICATE OF SERVICE**

I hereby certify that on 18 October 2021, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all parties that are CM/ECF participants in this action.

Dated: 18 October 2021 THE BEASLEY FIRM, LLC

/s/Peter J. Johnsen, Esquire

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